

**United States Bankruptcy Court
Western District of Missouri**

In re **Casey Drew O'Sullivan**

Debtor(s)

Case No.

Chapter **7**

Motion to Avoid Judicial Lien on Real Estate

1. Debtor, **Casey Drew O'Sullivan**, commenced this case on **April 3, 2015** by filing a voluntary petition for relief under Chapter 7 of Title 11 of the United States Bankruptcy Code.

2. This court has jurisdiction over this motion, filed pursuant to 11 U.S.C. Sec. 522(f) to avoid and cancel a judicial lien held by **CRP Holdings A-1, LLC** on real property used as the debtor's residence, under 28 U.S.C. Sec. 1334.

3. On **January 5, 2015**, creditors recorded a judicial lien against the following debtor's residence at:

**304 W 1st Terrace
Lamar, MO 64759**

The said judicial lien is entered of record as follows:

**15B4-CV00019
BARTON COUNTY, MISSOURI
JANUARY 5, 2015
\$770,949.00**

4. The debtor's interest in the property referred to in the preceding paragraph and encumbered by the lien has been claimed as full exempt in their bankruptcy case.

5. The existence of **CRP Holdings A-1, LLC** lien on debtor's real property impairs exemptions to which the debtor(s) would be entitled under 11 U.S.C. Sec. 522(b).

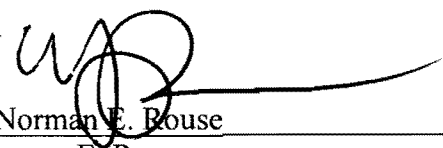
WHEREFORE, debtor(s) pray for an order against **CRP Holdings A-1, LLC** avoiding and canceling the judicial lien in the above-mentioned property, and for such additional or alternative relief as may be just and proper.


/s/Norman E. Rouse

Norman E. Rouse #27439
5957 E. 20th
Joplin, MO 64801
417-782-2222
417-782-1003

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served upon the parties herein by electronic notice or depositing the same in the U. S. Mail, postage prepaid, to: CRP Holdings A1 LLC, Tracy Wrisinger, Sader Law Firm, 2345 Grand Blvd., Ste. 1925, Kansas City, MO 64108 and Tracy Wrisinger 200 NE Missouri Rd., Ste. 200, Lees Summit, MO 64086, this 3RD day of APRIL, 2015.


/s/Norman E. Rouse

Norman E. Rouse